

1 AARON D. FORD  
Nevada Attorney General  
2 SCOTT H. HUSBANDS  
Deputy Attorney General  
3 Nevada Bar No. 11398  
GERALD L. TAN  
4 Deputy Attorney General  
Nevada Bar No. 13596  
5 State of Nevada  
Office of the Attorney General  
6 5420 Kietzke Lane, Suite 202  
Reno, NV 89511  
7 (775) 687-2121 (phone)  
(775) 688-1822 (fax)  
8 Email: [shusband@ag.nv.gov](mailto:shusband@ag.nv.gov)  
[gtan@ag.nv.gov](mailto:gtan@ag.nv.gov)  
9 *Attorneys for Defendants Bruce Breslow,*  
*Terry Reynolds, Scott Whittemore,*  
10 *Ruben Aquino, Genevieve Hudson,*  
*Ronald Grogan, Charles Harvey,*  
11 *Antoine "Chris" Rivers, and CJ Manthe*

12 UNITED STATES DISTRICT COURT

13 DISTRICT OF NEVADA

14 JOSEPH MORGAN, an individual,

15 Plaintiff,

16 v.

17 THE STATE OF NEVADA, *ex rel.* its  
DEPARTMENT OF BUSINESS AND  
18 INDUSTRY, STATE OF NEVADA *ex rel.*  
its TAXICAB AUTHORITY; BRUCE  
19 BRESLOW, in his individual capacity;  
SCOTT WHITTEMORE, in his individual  
20 capacity; RUBEN AQUINO, in his individual  
capacity; GENEVIEVE HUDSON, in her  
21 individual capacity; RONALD GROGAN, in  
his individual capacity; CHARLES  
22 HARVEY, in his individual capacity;  
ANTOINE "CHRIS" RIVERS, in his  
23 individual capacity; CJ MANTHE, in her  
individual capacity; DOES I through X  
24 inclusive; and ROES XI through XX,  
25 inclusive,

26 Defendants.

Case No. 2:19-cv-02239-KKD-DJA

**STIPULATION AND ORDER**  
**EXTENDING TIME FOR FRCP 26**  
**INITIAL DISCLOSURES**  
**(First Request)**

27 Defendants BRUCE BRESLOW, TERRY REYNOLDS, SCOTT WHITTEMORE,  
28 RUBEN AQUINO, GENEVIEVE HUDSON, RONALD GROGAN, CHARLES HARVEY,

1 ANTOINE “CHRIS” RIVERS, and C.J. MANTHE, by and through their attorneys, AARON D.  
2 FORD, Attorney General for the State of Nevada, SCOTT H. HUSBANDS, Deputy Attorney  
3 General, AND GERALD L. TAN, Deputy Attorney General, and Plaintiff JOSEPH MORGAN,  
4 by and through his counsel E. BRENT BRYSON, ESQ. of E. BRENT BRYSON, LTD.,  
5 pursuant to FRCP 26(a)(1)(C), LR IA 6-1, and LR IA 6-2, hereby stipulate and agree to a 14-  
6 day extension of time, up to and including June 16, 2020, for the parties to exchange their  
7 mandatory FRCP 26 initial disclosures.

8 This is the first request for an extension of time by the parties regarding their mandatory  
9 FRCP 26 initial disclosures. The parties are currently required to exchange their initial  
10 disclosures on June 2, 2020 as that is the date that is 14 days after counsel met for the required  
11 FRCP 26(f) conference.

12 This request is based on good cause and not for purpose of delay. The parties base this  
13 request on staffing and logistical challenges directly attributable to the COVID-19 pandemic.

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 Upon agreement by and between all the parties, through their respective counsel, the  
2 undersigned counsel respectfully request that this Court grant the parties a 14-day extension  
3 of time, up to and including, June 16, 2020, to exchange the mandatory initial disclosures  
4 required by FRCP 26.

5 DATED: June 2, 2020

6 AARON D. FORD  
7 Attorney General

E. BRENT BRYSON, LTD.

8 By: /s/ Scott H. Husbands

By: /s/ E. Brent Bryson

9 SCOTT H. HUSBANDS  
10 Deputy Attorney General

E. BRENT BRYSON  
Nevada Bar No. 4933

11 GERALD L. TAN  
12 Deputy Attorney General  
13 Nevada Bar No. 13596  
14 Office of the Attorney General

E. Brent Bryson, Ltd.  
7730 W. Sahara Avenue, Suite 109  
Las Vegas, Nevada 89117  
(702) 364-1234 (phone)  
(702) 364-1442 (fax)  
E-mail: [ebbesqltd@yahoo.com](mailto:ebbesqltd@yahoo.com)

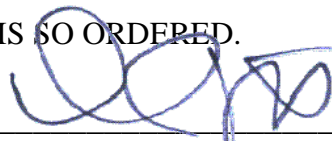
15 5420 Kietzke Lane, Suite 202  
16 Reno, Nevada 89511  
(775) 687-2142 (phone)  
(775) 688-1822 (fax)  
E-mail: [shusbands@ag.nv.gov](mailto:shusbands@ag.nv.gov)  
[gtan@ag.nv.gov](mailto:gtan@ag.nv.gov)

17 *Attorneys for Bruce Breslow, Terry Reynolds,*  
18 *Scott Whittemore, Ruben Aquino, Genevieve*  
19 *Hudson, Ronald Grogan, Charles Harvey,*  
*Antoine "Chris" Rivers, and CJ Manthe*

*Attorney for Joseph Morgan*

20  
21 **ORDER**

22 IT IS SO ORDERED.

23 

24  
25 DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

26 DATED: JUNE 3, 2020  
27  
28